

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Leonard A. Szplett,

Plaintiff

v.

Kenco Logistic Services, LLC, a Tennessee  
Limited Liability Company, Mars, Inc., The  
Hartford, David Jabaley, Mario Lopez,  
Tammi Fowler, Paula Hise, Trace Spier,  
Robert Coffey, Todd Moore, Jay Elliot, David  
Caines, Michael Manzello, David Crawley,  
and Kelvin Walsh

Defendants.

Case No. 1:19-cv-02500

Judge Gary Feinerman

Magistrate Judge Young B. Kim

**DEFENDANTS' UNOPPOSED MOTION FOR AN EXTENSION OF TIME TO  
ANSWER OR OTHERWISE PLEAD**

Defendants Mars, Inc., Robert Coffey, and Todd Moore, by and through their attorneys, Thomas R. Davies and Kimberly J. Overbaugh of Harmon & Davies, P.C., hereby move for an extension of time to answer or otherwise plead in response to Plaintiff's Complaint pursuant to Fed. R. Civ. Pro. 6(b). In support thereof, Defendants state as follows:

1. Plaintiff Leonard A. Szplett filed an employment discrimination complaint against Defendants alleging a variety of claims.
2. Defendant Mars was served with this action on May 24, 2019 and Mars' responsive pleading is currently due on June 14, 2019.
3. Defendant Coffey has also been served. Although Plaintiff has indicated that he believes Defendant Moore was served, Mr. Moore has not actually received the complaint. In any event, Defendant Moore is willing to waive service.
4. Counsel for Defendants would prefer to file one responsive pleading on behalf of

all Mars, Inc. defendants, including Coffey and Moore.

5. Due to the significant length of Plaintiff's complaint (943 paragraphs and 363 pages), and the efficiency of Defendants filing one responsive pleading rather than multiple similar responsive pleadings on different dates, Defendant has good cause for requesting a brief extension of time in order to perform a thorough inquiry into all statements contained in the complaint and formulate a unified response.

6. Accordingly, counsel for Defendants requests an extension until July 8, 2019 for Defendants Mars, Inc., Coffey, and Moore to answer or otherwise plead in order that Defendants may respond in a concise manner and avoid duplicative pleadings.

7. Counsel for Defendant has contacted Plaintiff to discuss this request. Specifically, Counsel for Defendant emailed Plaintiff on June 6, 2019, June 10, 2019, and June 12, 2019 to discuss the Motion with him. On June 13, 2019, Plaintiff informed Defendant by email that he was not opposed to the Motion.

8. This motion is being brought in good faith and for judicial economy to avoid the need for multiple responsive pleadings, and not for purposes of delay.

WHEREFORE, for all the reasons stated above, Defendants respectfully request that this Court grant Defendants' Unopposed Motion for Extension of Time to Answer or Otherwise Plead to Plaintiff's Complaint and enter an order extending the deadline for Defendants Mars, Inc., Coffey, and Moore to respond to the complaint until July 8, 2019.

Dated: June 14, 2019

Respectfully submitted,

/s/ Thomas R. Davies  
Thomas R. Davies, Esq. PA #35260

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Attorneys for Defendant  
Mars, Incorporated

**CERTIFICATE OF SERVICE**

I, Thomas R. Davies, an attorney, hereby certify that on June 14, 2019, I electronically filed a copy of the foregoing **DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD TO PLAINTIFF'S COMPLAINT PURSUANT TO FED. R. CIV. P. 6(b)** with the Clerk of the Court using the CM/ECF system. I further certify that a copy of the foregoing has been served by U.S. mail, postage prepaid to the following non-ECF participant:

Leonard A. Szplett  
3421 W. 1500 NW Road  
Kankakee, IL 60901

/s/ Thomas R. Davies  
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